

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

AUG 21 2001  
U.S. DISTRICT COURT  
S.D. OF MIAMI

CASE NO. 00-6309-Cr-Seitz

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH RUSSO and DOREEN RUSSO,  
et al,

Defendants.

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**UNOPPOSED MOTION TO CONTINUE  
PRETRIAL DETENTION HEARING**

The Defendants, JOSEPH RUSSO and DOREEN RUSSO, by and through undersigned counsel, move this Honorable Court for a continuance of the Pretrial Detention Hearing. As grounds in support therefore the Defendants state:

1. On Wednesday, August 22, 2001, Joseph Russo and his wife Doreen Russo were arrested and brought before this Court for initial appearance at which time the government announced it was seeking pretrial detention on Defendant Joseph Russo.

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2. Doreen Russo was released on a \$100,000 personal surety bond.

3. Undersigned counsel entered a temporary appearance for both Defendants and agreed to conduct the Pretrial Detention Hearing on Friday, August 24, 2001 at 2:00 p.m. before the Honorable Magistrate Judge Barry Garber.

4. Unfortunately, due to personal unavoidable circumstances, undersigned counsel was unable to meet with Mr. Russo until Thursday evening (August 23<sup>rd</sup>), making preparations for the Pretrial Detention Hearing impossible for Friday, August 24th.

5. Undersigned counsel contacted Assistant United States Attorney Diana Fernandez who has no objection to the continuation of the hearing to be rescheduled on Wednesday, August 29, 2001 at 10:00 a.m. before the Honorable Magistrate Judge William Turnoff.

6. Undersigned counsel requests additional time in which to file a permanent appearance in this case and to advise the court of counsel for the remaining defendant.

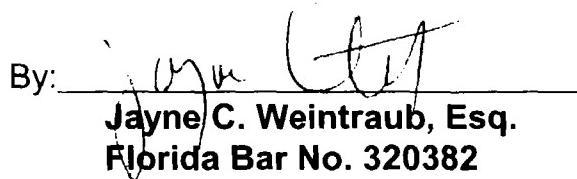
7. Undersigned counsel requests that a Report Re Counsel and Pretrial Detention Hearing be scheduled for Wednesday, August 29, 2001 at 10:00 a.m. before the Honorable Magistrate Judge William Turnoff.

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WHEREFORE, for the foregoing reasons, undersigned counsel respectfully requests this Honorable Court to grant a continuance of the Pretrial Detention Hearing and reschedule it for Wednesday, August 29, 2001 at 10:00 a.m.

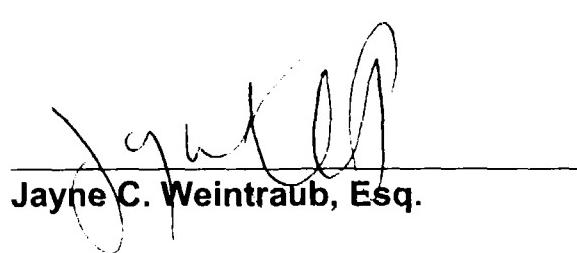
Respectfully submitted,

**JAYNE C. WEINTRAUB, P.A.**  
100 S. E. 2<sup>nd</sup> St., Suite 3550  
Miami, FL 33131  
Phone: (305) 374-1818  
Facsimile: (305) 358-5917

By:   
**Jayne C. Weintraub, Esq.**  
Florida Bar No. 320382

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been furnished by mail to **Diana Fernandez, Assistant United States Attorney**, 99 N. E. 4<sup>th</sup> St., Miami, FL 33132 and faxed to 954-356-7230 this 23<sup>rd</sup> day of August, 2001.

  
**Jayne C. Weintraub, Esq.**